

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Sean Pak (Bar No. 219032)

3 seanpak@quinnemanuel.com

4 Melissa Baily (Bar No. 237649)

5 melissabaily@quinnemanuel.com

6 James Judah (Bar No. 257112)

7 jamesjudah@quinnemanuel.com

8 Lindsay Cooper (Bar No. 287125)

9 lindsaycooper@quinnemanuel.com

10 Iman Lordgooei (Bar No. 251320)

11 imanlordgooei@quinnemanuel.com

12 50 California Street, 22nd Floor

13 San Francisco, California 94111-4788

14 Telephone: (415) 875-6600

15 Facsimile: (415) 875-6700

16 Marc Kaplan (*pro hac vice*)

17 marckaplan@quinnemanuel.com

18 191 N. Wacker Drive, Ste 2700

19 Chicago, Illinois 60606

20 Telephone: (312) 705-7400

21 Facsimile: (312) 705-7401

22 *Attorneys for GOOGLE LLC*

23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA

25 SAN FRANCISCO DIVISION

26 SONOS, INC.,

27 Plaintiff,

28 vs.

GOOGLE LLC,

Defendant.

CASE NO. 3:20-cv-06754-WHA

Consolidated with CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF STIPULATED  
REQUEST FOR ORDER EXTENDING  
THE MOTION FOR ATTORNEYS' FEES  
DEADLINE**

1 I, Lindsay Cooper, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP representing  
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this  
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s and Sonos, Inc.’s (“Sonos”)  
7 (collectively, the “Parties”) stipulated request for an order extending the motion for attorneys’ fees  
8 deadline.

9 3. On October 23, 2023, the Parties met and conferred and agreed that “a stipulation  
10 that any fees motion will be made only after all appellate review is exhausted” would preserve  
11 judicial resources and facilitate the efficient resolution of this matter. Dkt. 872 at 2.

12 4. The proposed extension will not affect the parties’ ability to comply with the other  
13 deadlines set forth in this case.

14 5. With respect to Civil L.R. 6-3(a)(5), I am aware of the following previous  
15 modifications to the case schedule based on my review of the docket:

- 16 a. On March 12, 2022, the Parties stipulated to an extension of Google’s deadline to  
17 answer or move to dismiss Sonos’s counterclaims to seven days after the Court’s  
order on Google’s motion to dismiss in the related case. Dkt. 156.
- 18 b. On May 18, 2022, the Court vacated the initial patent showdown trial date and set  
19 the trial for October 3, 2022. Dkt. 269.
- 20 c. On May 4, 2022, the Court granted the Parties’ stipulated request to extend the  
mediation deadline to accommodate their preferred mediator’s schedule. Dkt. 245.
- 21 d. On July 15, 2022, the Court granted the Parties’ stipulated request to extend expert  
22 pretrial deadlines for the patent showdown trial. Dkt. 304.
- 23 e. On August 22, 2022, the Court granted the parties’ stipulated request to extend the  
expert discovery deadline for the patent showdown trial. Dkt. 328.
- 24 f. On November 14, 2022, the Court granted the Parties’ stipulated request to extend  
25 expert report and discovery deadlines. Dkt. 402.
- 26 g. On December 7, 2022, the Court granted the Parties’ stipulated request to extend  
27 the deadline for Google’s Opposition to Sonos’s Motion for Leave to Amend  
28 Infringement Contentions Pursuant to Patent L.R. 3-6. Dkt. 417.

- 1 h. On December 22, 2022, the Court granted the Parties' stipulated request to extend  
2 the deadline for Expert Discovery, Expert Reports, and Dispositive Motions. Dkt.  
3 434.
- 4 i. On January 4, 2023, the Court advanced the trial date from May 10, 2023 to May 8,  
5 2023. Dkt. 444.
- 6 j. On January 27, 2023, the Court granted the Parties' stipulated request to extend the  
7 close of fact discovery to accommodate the Parties' expert witnesses' schedules.  
8 Dkt. 460.
- 9 k. On March 9, 2023, the Court granted the Parties' stipulated request for an order  
10 setting a schedule for pretrial deadlines. Dkt. 547.
- 11 l. On June 7, 2023, the Court granted the Parties' joint stipulation extending time for  
12 filing bill of costs. Dkt. 811.
- 13 m. On July 30, 2023, the Court granted Google's administrative motion to extend the  
14 deadlines for its new omnibus motion to seal and the parties' refilings of all  
15 material they no longer seek to seal. Dkt. 850.
- 16 n. On October 21, 2023, the Court granted Google's unopposed administrative motion  
17 to extend the deadline for its motion for attorneys' fees pursuant to 28 U.S.C. § 285  
18 and bill of costs. Dkt. 872.

19 I declare under penalty of perjury under the laws of the United States of America that to the  
20 best of my knowledge the foregoing is true and correct. Executed on October 26, 2023, in Mill  
21 Valley, California.  
22  
23  
24  
25  
26  
27  
28

By: /s/ Lindsay Cooper  
Lindsay Cooper

**ECF ATTESTATION**

I, Sean Pak, am the ECF User whose ID and password are being used to file this Declaration.  
In compliance with Civil Local Rule 5-1, I hereby attest that Lindsay Cooper has concurred in this filing.

Dated: October 26, 2023

By: /s/ Sean Pak  
Sean Pak